



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

Jul 30 2009

Craig Wilcox
Coronado National Forest
Safford Ranger District
711 S. 14th Avenue, Suite D
Safford, AZ 85546

Subject: Draft Environmental Impact Statement (DEIS), Pinaleño Ecosystem Restoration Project, Coronado National Forest, Graham County Arizona (CEQ # 20090188)

Dear Mr. Wilcox:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508), and our NEPA review authority under Section 309 of the Clean Air Act. Based on our review, we have rated the Draft Environmental Impact Statement (DEIS) as Lack of Objections (LO) (see enclosed "Summary of Rating Definitions").

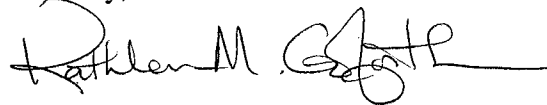
The proposed project would restore the fire-adapted ecosystem in the Pinaleño Mountains to protect and restore habitat for the federally endangered Mount Graham red squirrel. The proposed action (Alternative 2) is to manage vegetation on approximately 3,705 acres using a combination of silvicultural and fuels reduction treatments. The DEIS also evaluated a Mexican spotted owl emphasis alternative (Alternative 3) which would treat fewer acres, limit live tree thinning to trees less than 9 inches in diameter, and avoid treatments within Mexican spotted owl core areas. Alternative 2 is identified as the preferred alternative.

The project also proposes to amend the Coronado National Forest Land and Resource Management Plan to allow Christmas tree removal and public firewood gathering in the project area, and the DEIS states that these actions are also evaluated in the document. However, only in the cultural resources section was this evaluation apparent. We recommend that this element of the project be more fully evaluated in the Final EIS (FEIS). We also recommend that the cumulative effects of climate change on the project be discussed. Our detailed comments on these recommendations are enclosed.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released for public review, please send one copy to the address above (mail code: CED-2). If you have

any questions, please contact me at (415) 972-3521, or contact Karen Vitulano, the lead reviewer for this project, at 415-947-4178 or vitulano.karen@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathleen M. Goforth". The signature is fluid and cursive, with a long horizontal stroke at the end.

Kathleen M. Goforth, Manager
Environmental Review Office (CED-2)

Enclosure: Summary of EPA Rating Definitions
EPA's Detailed Comments

cc: Marit Alanen, U.S. Fish and Wildlife Service

SUMMARY OF EPA RATING DEFINITIONS*

This rating system was developed as a means to summarize the U.S. Environmental Protection Agency's (EPA) level of concern with a proposed action. The ratings are a combination of alphabetical categories for evaluation of the environmental impacts of the proposal and numerical categories for evaluation of the adequacy of the Environmental Impact Statement (EIS).

ENVIRONMENTAL IMPACT OF THE ACTION

"LO" (Lack of Objections)

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

"EC" (Environmental Concerns)

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

"EO" (Environmental Objections)

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

"EU" (Environmentally Unsatisfactory)

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potentially unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

ADEQUACY OF THE IMPACT STATEMENT

"Category 1" (Adequate)

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

"Category 2" (Insufficient Information)

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analysed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

"Category 3" (Inadequate)

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analysed in the draft EIS, which should be analysed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

*From EPA Manual 1640, Policy and Procedures for the Review of Federal Actions Impacting the Environment.

Impacts not fully assessed from Forest Plan amendments

The proposed action includes amending the Forest Plan to allow Christmas tree removal and public firewood gathering in the project area. The impacts of allowing these activities do not appear to be fully addressed in the Draft Environmental Impact Statement (DEIS). It is not clear where these activities would most likely occur and how many people the Forest Service expects would participate in these activities. Additionally, with the exception of the discussion of cultural resources (p. 187-188), it is not clear where the impacts from the addition of these activities are assessed. The DEIS notes that vehicle and foot traffic from recreationalists and wood gatherers often interrupts foraging and other behaviors by the red squirrel and Mexican spotted owl, with the potential to cause direct mortality to these species; however this is discussed in the cumulative impacts section (p. 114, 124), and seems to refer to wood gathering that is currently allowed for on-site recreational use. The addition of new public access and vehicle trips for the purposes of firewood gathering for off-site use would add to the impacts identified above. It is also not clear if the estimated traffic increases: 52-157% for Alternative 2, and 7-21% for Alternative 3 (p. 107, 129), include trips from Christmas tree removal and public firewood gathering activities.

Recommendation: Provide additional information in the Final Environmental Impact Statement (FEIS) regarding expected activity levels for Christmas tree removal and public firewood gathering in the project area. Include a discussion of how this increased vehicle and foot traffic would impact resources, including soils, water resources, and the red squirrel and Mexican spotted owl, given that existing recreational wood gathering can cause mortality to these species. Clarify whether traffic increase estimates include Christmas tree removal and public firewood gathering activities, and identify the assumptions used in these estimates. Include how these activities will be monitored for impacts and if the public will be educated regarding the presence of protected species.

Cumulative impacts from climate change not discussed

The DEIS does not mention potential effects from climate change on the success of the project nor indicate whether nor how these effects were considered in the project design. The recent U.S. Global Change Research Program report *Global Climate Change Impacts in the United States*¹ predicts that increasing temperature, drought, wildfire, and invasive species will accelerate transformation of the landscape in the southwestern United States. Information on the Arizona Department of Game and Fish website suggests a relationship between red squirrel populations and precipitation.²

Recommendation: In the FEIS, discuss the cumulative impacts from climate change on the red squirrel and the potential for these impacts to affect the success of the project. To the extent information is known, a discussion of the red squirrel's ability to adapt to a changing climate would be appropriate.

¹ Available: <http://www.globalchange.gov/publications/reports/scientific-assessments/us-impacts>

² http://www.azgfd.gov/artman/publish/article_554.shtml